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February 23, 1994

William F. Caton
Acting Secretary
Federal Communications Commission
Room 222
1919 M St., NW
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Re: EX PARTE SUBMISSION
CC Docket No. 92-237, Phase I

Dear Mr. Caton:

On May 6, 1993, a coalition of consumer and users groups¹ filed a letter in the instant proceeding (Administration of the North American Numbering Plan) requesting that the Commission initiate a rulemaking proceeding to consider implementation of a uniform, nationwide dialing plan. The Coalition expressed concern that Bellcore's (the North American Numbering Plan Administrator) plan to allow LECs to eliminate use of the digit "1" as a toll call identifier as they implement interchangeable NPA codes² will be confusing to customers, will make it difficult to program PBXs to restrict toll calls, and will adversely affect intraLATA toll competition where such competition has been authorized.

¹The Ad Hoc Telecommunications Users Committee; the California Bankers Clearing House Association, MasterCard International, Inc., New York Clearing House Association, and Securities Industry Association; Consumer Federation of America; County of Los Angeles; Information Technology Association of America; International Communications Association; New York Consumer Protection Board; and Telecommunications Association (collectively, "the Coalition").

²Under the Bellcore plan, LECs could require toll calls within the home NPA to be dialed on either a 7-digit or 1+ 10-digit basis, and calls to a different NPA, whether local or toll, to be dialed on a 1+ 10-digit basis.

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Sprint shares the Coalition's concerns about the new Bellcore dialing plan, and accordingly joins other parties³ urging grant of the Coalition's petition for rulemaking. The need for prompt Commission action has increased since the Coalition first filed its petition. Implementation of interchangeable NPAs is now less than a year away, and the BOCs apparently have already begun taking steps to implement dialing plans which have not been agreed upon by the industry. Pacific Bell stated (in an ex parte letter in this proceeding dated May 28, 1993) that it expected to implement a statewide dialing plan, under which California customers would dial 11 digits for both toll and local calls to a foreign NPA, and 7 digits for all home NPA calls, in October 1993. Sprint recently learned that at least one other RBOC also has begun to deploy software in its central offices which would use the "1+" indicator solely to signal the switch that 10 more digits (for either a local or a toll call) are forthcoming. Further, other LECs (most recently, C&P of West Virginia) continue to propose implementation of 7-digit intraLATA toll dialing. As the Coalition and other parties have pointed out,⁴ these types of dialing plans will cause substantial customer confusion and blur the line between local and toll calls.

The Dialing Plan Workshop of the Industry Numbering Committee (part of the Industry Carriers Compatibility Forum) is now considering the issue of a uniform dialing plan, including use of the prefix "1" (Issue No. 20, mission and scope attached). However, the recommendations arising out of this workshop are not binding on industry members, and there is no assurance that LECs will agree to implement a recommendation to adopt a nationwide uniform dialing plan. Indeed, the record in the instant proceeding indicates a reluctance on the part of some BOCs to implement a nationwide uniform dialing plan such as the one proposed by the Coalition. Therefore, it is important that the Commission also consider the issue of a uniform dialing plan, and promptly initiate the rulemaking proceeding requested by the Coalition last May.

Sincerely,



Norina Moy
Director, Federal Regulatory
Policy and Coordination

³ See, e.g., letters submitted in this proceeding by MCI (May 27, 1993) and AT&T (December 7, 1993).

⁴ See, e.g., AT&T letter, p. 2; MCI letter, p. 1.

cc: Kathleen Levitz
James Schlichting
Peyton Wynns

**ICCF
INC
DIALING PLAN WORKSHOP**

MISSION & SCOPE

Mission:

The Workshop will study the dialing considerations and feasibility of recommending a uniform dialing plan for all/some calls within the North American Numbering Plan (NANP) Area that utilize NANP resources. Additionally, abbreviated dialing options and their relative benefits/detriments will be examined. The Workshop will accept input from other industry fora and make appropriate recommendations to the telecommunications sector, where possible.

Scope:

The Workshop will define potential dialing plans and evaluate factors which may encourage a uniform dialing plan, including technical and end user considerations regarding use of the prefix "1". A uniform dialing plan may include, but not be limited to, access dialing arrangements (i.e. 950 - 10XXX, etc.) which an end user might dial to gain access to a designated service provider. Additionally, the Workshop will define abbreviated access, evaluate identified access applications/services and current technical capabilities to support those applications. The Workshop will make appropriate recommendations as needed.

Agreed to 2/9/94